REMARKS

Claims 9, 11, 14-16, 19, 20, and 21 are pending in this application. Claims 9 and 14-16 are amended herein. Claims 20 and 21 are added herein. Support for the amendments to the claims may be found in the claims as originally filed and in the specification at page 11, line 21 to page 13, line 3, at page 15, line 17 to page 16, line 5, and at page 18, line 18 to page 19 line 10, and in Figs. 2, 4, 6, 10, and 11. No new matter has been added. Reconsideration is requested based on the foregoing amendment and the following remarks.

Response to Arguments:

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The final Office Action responded to the argument that Price shows no graphical user interface (GUI), which allows the user to select a communication media to be used when receiving the answer from the operator, and to input contents of the inquiry and information related to the user, by asserting at page 8, paragraph a) of the final Office Action that the "interactive web page" of Price reads on a GUI interface. The final Office Action reasons that, since the interactive web page of Price allows a customer to enter questions and post telephone numbers and e-mail addresses so that the customer may receive a response by voice or e-mail, it is equivalent to a GUI. This is submitted to be incorrect.

For example, the final Office Action looks to column 5, lines 1-4 of Price to support the assertion that the "interactive web page" of Price reads on a GUI interface. Column 5, lines 1-4 of Price, however, describe merely:

> (3)   Customer A 32 and customer B 34 can interact with the enterprise web presentation.
> (4a)   Customer A 32 can type a text question and request to be connected to an agent.

Thus, in Price, customer A 32 and customer B 34 are given an enterprise web presentation to view while waiting for an agent to get to them. Neither the enterprise web presentation nor the option of typing a question and requesting to be connected to an agent amount to a GUI interface, let alone a GUI interface which allows the user to select a communication media to be used when receiving the answer from the operator, and to input contents of the inquiry and information related to the user.

Furthermore, as described at column 6, lines 28-32, which were also selected by the final Office Action:

(6)   Agent 30 can select customer A 32 and be connected one-to-one with customer A 32 for a voice conversation. This may occur with a web callback (customer A 32 posts the phone number he is at and agent 30 calls customer A 32), Voice over IP, or other forms of voice communication.

Thus, in Price, if customer A 32 is selected by agent 30, he gets to talk to him. This is not like claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Finally, as described at column 7, lines 38-41:

Text response 52 and voice response 50 can be made in the manner as described by FIGS. 2 and 4, respectively. E-mail response 48 can be made by customer 42 specifying his E-mail address in a voice connection as described by FIG. 5, or in a text connection as described by FIG. 3.

Thus, in Price, Customer 42 is given an option of text, voice, or email responses. This does not amount to "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user," as recited in claim 9.

The final Office Action must have found the argument that Price shows no processing unit, which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media, selected when answering the inquiry at least somewhat persuasive, since the final Office Action does not even assert, in the Response to Arguments at page 8 of the final Office Action, that Price *does* show such a queue.

The final Office Action, rather, informs us instead that the queue recited in claim 9 is *not* on an operator terminal. The final Office Action thus appears to have realized that Price shows no queue on an operator terminal, and instead has fallen back on asserting that *our* specification supports no such queue. This is submitted to be incorrect. The specification does indeed support a queue on an operator terminal at, inter alia page 4, lines 7, 8, and 9, page 30, lines 13 and 14, and page 31, lines 3 and 4. Further reconsideration is thus requested.

Claim Rejections - 35 U.S.C. § 103:

Claims 9, 11-16 and 19 were rejected under 35 U.S.C. § 103(a) as unpatentable over US Patent No. 6,389,132 to Price, (hereinafter "Price"). The rejection is traversed to the extent it would apply to the claims as amended.

The fourth clause of claim 9 recites:

> At least one second-line operator terminal through which a second operator
> receives the inquiry from the user via the first-line operator terminal and answers
> the inquiry, when the first operator fails to solve a problem relating to the inquiry.

Price neither teaches, discloses, nor suggests, "at least one second-line operator terminal through which a second operator receives the inquiry from the user via the first-line operator terminal and answers the inquiry, when the first operator fails to solve a problem relating to the inquiry," as recited in claim 9. As Price, rather, describes in the Abstract, "agents can multi-task by providing assistance to multiple customers at one time." Price is thus about allowing *one* agent to service *many* customers, so Price will not be providing, "at least one second-line operator terminal through which a second operator receives the inquiry from the user via the first-line operator terminal and answers the inquiry, when the first operator fails to solve a problem relating to the inquiry," as recited in claim 9.

The seventh clause of claim 9 recites:

> A graphical user interface which allows the user to select a communication media
> to be used when receiving the answer from the operator and to input contents of
> the inquiry and information related to the user.

Price neither teaches, discloses, nor suggests a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user, as recited in claim 9. In Price, rather, as described at column 6, lines 14-17:

> (3) Customer A 32 and customer B 34 can interact with the enterprise web
> presentation. Both the web pages of customer A 32 and customer B 34 can
> display a "Live voice request button."

Thus, in Price, customer A 32 and customer B 34 are given an enterprise web presentation with which to amuse themselves while waiting for an agent to get to them. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 6, lines 17-20:

> Alternatively, customer A 32 or customer B 34 may initiate a phone call to a call
> center and subsequently a simultaneous web connection with an agent may be
> established.

Thus, in Price, customer A 32 and customer B 34 can call the call center on the phone if the get tired of waiting for an agent to get to them, *after* which a web connection might be established. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 7, lines 41-46:

Customer 42 may also access the enterprise company E-mail address from the enterprise company presentation page. By clicking on the E-mail address, customer 42 can E-mail a question which is queued for agent 30. Agent 30 can respond to the question with E-mail response 48.

Thus, in Price, Customer 42 is given access to the enterprise company E-mail address from the enterprise company presentation page so customer 42 can E-mail a question to agent 30 in the event that they get tired of waiting for an agent to get to them. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 7, lines 28-34:

FIG. 6 represents another embodiment of the present invention in which agent 30 can multi-task across multimedia conversation types. For example, agent 30 can simultaneously handle a live voice conversation, a live text conversation, and an offline E-mail task.

Thus, in Price, agent 30 can simultaneously handle a live voice conversation, a live text conversation, and an offline E-mail task. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Finally, as described at column 7, lines 34-37:

Customer 42 may request E-mail response 48, customer 44 may request voice response 50, and customer 46 may request text response 52. Text response 52 and voice response 50 can be made in the manner as described by FIGS. 2 and 4, respectively.

Figs. 2 and 4 show timelines, not graphical user interfaces. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

The tenth clause of claim 9 recites:

> Said second-line operator terminal is configured to display the first screen and the
> second screen when the problem is escalated to the second-line operator
> terminal and is configured to allow the second operator to input an answer to the
> problem.

Price neither teaches, discloses, nor suggests, "said second-line operator terminal is configured to display the first screen and the second screen when the problem is escalated to the second-line operator terminal and is configured to allow the second operator to input an answer to the problem," as recited in claim 9. Price, rather, is about allowing one agent to service many customers, as discussed above, so Price will not be providing, "said second-line operator terminal is configured to display the first screen and the second screen when the problem is escalated to the second-line operator terminal and is configured to allow the second operator to input an answer to the problem," as recited in claim 9.

The thirteenth clause of claim 9 recites:

> A processing unit which successively processes the inquiries in a queue for said
> first-line operator terminal such that said first-line operator terminal communicates
> with the client terminal using the communication media selected when answering
> the inquiry.

Price neither teaches, discloses, nor suggests "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry," as recited in claim 9. Price, rather, has pretty much given up processing inquiries successively, i.e. in the order in which they were received, and seeks to provide a way to reduce the backlog by diverting some of the inquiries to, for example, a specialized agent. In particular, as described at column 2, lines 14-19:

> Another technical advantage of the present invention is that customers can be
> grouped and their requests can be forwarded to a specialized agent or a live
> event. In this case, a group of customer requests can be serially addressed, thus
> saving time and money to the web-based call center.

Thus, in Price, customers can be taken out of the queue and grouped and their requests can be forwarded to a specialized agent or a live event. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 4, lines 1-6:

12

(5) Customer 12 can be placed on hold while waiting for an available agent.

(6) Customer 12 can be provided information about the expected hold time, number in the queue of customer contact requests. Customer 12 can be provided the option to schedule an agent connection at a later time.

Thus, in Price, a customer on hold can be coaxed to leave the queue with depressing accounts of interminable wait times. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 5, lines 3 and 4:

(4a) Customer A 32 can type a text question and request to be connected to an agent. (4b)

Thus, in Price, a customer on hold can request to be connected with an agent directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 5, lines 4 and 5:

(4b) The request can be queued at Contact Server 20 and (4c) routed by Contact Server 20 to agent 30.

Thus, in Price, a request of a customer on hold can be routed to an agent directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Finally, as described at column 5, lines 6-10:

Agent 30 can receive a request notification from Contact Server 20. The request notification may take the form of a visual and audio notice that is displayed on a work station of agent 30. The request may also be a new item in the work tray of agent 30.

Thus, in Price, Agent 30 can receive a request of a customer on hold directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal

communicates with the client terminal using the communication media selected when answering the inquiry." Claim 9 is submitted to be allowable. Withdrawal of the rejection of claim 9 is earnestly solicited.

Claims 11, 12, 13 and 19 depend from claim 9 and add further distinguishing elements. Claims 11, 12, 13 and 19 are thus also submitted to be allowable. Withdrawal of the rejection of claims 11, 12, 13 and 19 is also earnestly solicited.

Claim 14:

The second clause of claim 14 recites:

The selection and the input being performed by a user using a graphical user interface of said client terminal, the user's selection being made between at least two available communication media choices comprising a telephone and an email.

Price neither teaches, discloses, nor suggests "the selection and the input being performed by a user using a graphical user interface of said client terminal, the user's selection being made between at least two available communication media choices comprising a telephone and an email," as discussed above with respect to the rejection of claim 9.

The eighth clause of claim 14 recites:

Sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry.

Price neither teaches, discloses, nor suggests "sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry," as discussed above with respect to the rejection of claim 9.

The ninth clause of claim 14 recites:

Displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal.

Price neither teaches, discloses, nor suggests "displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal," as discussed above with respect to the rejection of claim 9.

The eleventh clause of claim 14 recites:

Providing a control to successively process the inquiries in the queue for said first-line operator terminal.

Price neither teaches, discloses, nor suggests "providing a control to successively process the inquiries in the queue for said first-line operator terminal," as discussed above with respect to the rejection of claim 9. Claim 14 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 14 is earnestly solicited. Claim 14 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 14 is earnestly solicited.

Claim 15:

The second clause of claim 15 recites:

Displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said first-line operator terminal or said second-line operator terminal and for inputting contents of the inquiry and information related to the user.

Price neither teaches, discloses, nor suggests "displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said first-line operator terminal or said second-line operator terminal and for inputting contents of the inquiry and information related to the user," as discussed above with respect to the rejection of claim 9.

The eighth clause of claim 15 recites:

Sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry.

Price neither teaches, discloses, nor suggests "sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry," as discussed above with respect to the rejection of claim 9.

The ninth clause of claim 15 recites:

Displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal.

Price neither teaches, discloses, nor suggests "displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal," as discussed above with respect to the rejection of claim 9.

The eleventh clause of claim 15 recites:

providing a control to successively process the inquiries in the queue for said first-

line operator terminal.

Price neither teaches, discloses, nor suggests "providing a control to successively process the inquiries in the queue for said first-line operator terminal," as discussed above with respect to the rejection of claim 9. Claim 15 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 15 is earnestly solicited.

Claim 16:

The second clause of claim 16 recites:

Displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said first-line operator terminal or said second-line operator terminal and for inputting contents of the inquiry and information related to the user.

Price neither teaches, discloses, nor suggests "displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said first-line operator terminal or said second-line operator terminal and for inputting contents of the inquiry and information related to the user," as discussed above with respect to the rejection of claim 9.

The eighth clause of claim 16 recites:

Sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry.

Price neither teaches, discloses, nor suggests "sending information from said first-line operator terminal to said second-line operator terminal when said first-line operator terminal fails to answer the inquiry," as discussed above with respect to the rejection of claim 9.

The ninth clause of claim 16 recites:

Displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal.

Price neither teaches, discloses, nor suggests "displaying the first screen and the second screen at said second-line operator terminal, when the problem is escalated to the second-line operator terminal," as discussed above with respect to the rejection of claim 9.

The eleventh clause of claim 16 recites:

Providing a control to successively process the inquiries in a queue for said first-line operator terminal.

Price neither teaches, discloses, nor suggests "providing a control to successively process the inquiries in a queue for said first-line operator terminal," as discussed above with respect to the rejection of claim 9. Claim 16 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 16 is earnestly solicited.

New Claims 20 and 21:

Claim 20 recites:

Successively processing the inquiries in which the user has either selected a telephone call or an e-mail as the communication media for receiving the answer in a queue for an operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry.

None of the cited references teach, disclose, or suggest "successively processing the inquiries in which the user has either selected a telephone call or an e-mail as the communication media for receiving the answer in a queue for an operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry," as recited in claim 20. Claim 20 is thus believed to be allowable.

New claim 21:

The fourth clause of claim 21 recites:

At least one second-line operator terminal, connected to said server, for receiving the inquiry from the user via the first-line operator terminal and for answering the inquiry, when an operator at said first-line operator terminal fails to answer the inquiry.

None of the cited references teach, disclose, or suggest "at least one second-line operator terminal, connected to said server, for receiving the inquiry from the user via the first-line operator terminal and for answering the inquiry, when an operator at said first-line operator terminal fails to answer the inquiry," as discussed above with respect to the rejection of claim 9.

The sixth clause of claim 21 recites:

Said second-line operator terminal is configured to display the first screen and the second screen when the inquiry is escalated to the second-line operator terminal and is configured to allow the second operator to input an answer to the query.

None of the cited references teach, disclose, or suggest "said second-line operator terminal is configured to display the first screen and the second screen when the inquiry is escalated to the second-line operator terminal and is configured to allow the second operator to input an answer to the query," as discussed above with respect to the rejection of claim 9.

The ninth clause of claim 21 recites:

A processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry.

None of the cited references teach, disclose, or suggest "a processing unit which successively processes the inquiries in a queue for said first-line operator terminal such that said first-line operator terminal communicates with the client terminal using the communication media selected when answering the inquiry," as discussed above with respect to the rejection of claim 9. Claim 21 is thus believed to be allowable as well, for at least those reasons discussed above with respect to claim 9.

Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 9, 11, 14-16, 19, 20, and 21 are allowable over the cited references. Since the objections to the claims were addressed, it is submitted that all of claims 9, 11, 14-16, 19, 20, and 21 are now in a condition suitable for allowance. An early Notice of Allowance is requested.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 06 MK 06

By: Thomas E. McKiernan
Registration No. 37,889

1201 New York Ave, N.W., 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501